

# EXHIBIT “A”

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
PHILADELPHIA COUNTY  
CASE NO. 19-04078-RBS

-----x  
EVELYN CINTRON,

Plaintiff,

v.

CITY OF PHILADELPHIA, et al,

Defendants.

-----x  
1717 Arch Street

Philadelphia, Pennsylvania

October 28, 2022

11:03 a.m.

VIDEOTAPED DEPOSITION of EVELYN  
CINTRON, the Plaintiff, held at the  
above-entitled time and place, taken before  
Carolyn Crescio, a Professional Shorthand  
Reporter and Notary Public of the State of  
Pennsylvania.

23 \* \* \* 24  
25

E. CINTRON

And they did this behind my back because neither sergeants informed me that they were going to do that, because if they had informed me, I would have -- it was a standing order on my part that the center was to remain closed. And they went behind my back because Ted told them to open it and not to listen to me.

Q. So are Faust and Irving the two sergeants in the PAL unit?

A. Yes.

Q. And who is it that told you Ted told them to do this?

A. Both sergeants. Ted Qualli was called to come to the center again. This time when he showed up at the center, he confirmed what the sergeant said. He told me, Lieutenant, like I told you, you are not -- I spoke to the board, and you're not allowed to shut down the center. We would lose a lot of funding if they know that this is not a viable center.

And I stated to him that money, the money that they get for the center was not more important than the safety of the kids.

And I later found out that they were

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2 Q. If you were aware of the meetings,  
3 were you told that you were not invited?

4 A. They told me that I would be getting  
5 an Outlook invite every month, which I never  
6 did. And when I asked why I wasn't attending  
7 these meetings, Ted said they only wanted --

8 (Court reporter clarification.)

9 A. Ted Qualli stated that they only  
10 wanted to meet with him.

11 Q. And so when you say -- who do you --  
12 who are you referring to by "they"?

13 A. When I would ask him why I was being  
14 excluded from the decision-making meetings that  
15 they held monthly with Bernie Prazenica and Ron  
16 Rabena, he told me they only wanted to meet with  
17 him.

18 Q. As the executive director for PAL?

19 A. Yes.

20 Q. And was it meetings with the board  
21 or meetings with only Ron and Prazenica?

22 A. It was both. Sometimes they would  
23 meet with the board, but the monthly meeting was  
24 just with Ron Rabena. I don't know who else  
25 would attend because I wasn't there, but the

1 E. CINTRON

2 Q. So this was a general meeting, you  
3 said?

4 A. Yes.

5 Q. And when did that occur?

6 A. 2016.

7 Q. Was this the only meeting you  
8 attended?

9 A. No, I would go to the general  
10 meetings. The meetings I wasn't invited to were  
11 the decision-making meetings.

12 Q. So is it your testimony that no  
13 decisions were made during general meetings?

14 A. No. That was just the reporting  
15 from the different committees, the different  
16 committees reporting out.

17 Q. So I guess what I'm trying to find  
18 out is if no decisions were being made during  
19 the general meetings, why are Ted, Bernie, and  
20 Ron going, like, to have a sidebar?

21 A. That's something you have to ask  
22 them.

23 Q. So you don't know what they were  
24 deciding?

25 A. Well, no, they were talking about

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the topics that would come up or that I would bring up.

Q. And -- but you don't know what they discussed during those sidebars?

A. No.

Q. I want to again ask -- the exclusion from the meetings, how do you know you were excluded from the meetings based on your national origin?

A. I was a female commander in an important unit like PAL, and I was being excluded from attending the meetings that had to do with making decisions under my authority as commanding officer. Yet all of the males that were also involved making decisions would be at these meetings. So it's -- it was -- you know, it was vividly known that it was me who they didn't want in the meeting.

Q. So what I want to know is, they didn't want you in the meeting, how do you know that had to do with your national origin?

A. I'm the top female commander at PAL responsible for making decisions, responsible for the officers, responsible for the kids,

1 E. CINTRON

2 is what they were doing.

3 Q. So would they let a male Latino make  
4 that --

5 A. I don't know what they would do, but  
6 I know that the previous commander was white,  
7 and they didn't exclude him from the meetings.

8 Q. How do you know that?

9 A. Because they told me that Lieutenant  
10 Eddis would attend the meetings.

11 (Court reporter clarification.)

12 A. Eddis.

13 Q. E-D-D-I-S.

14 And so when you say "they," you're  
15 referring to Ron, Bernie, and Ted?

16 A. Yes, when they told me that I would  
17 be attending the same meeting as well, but then  
18 was not invited to attend. I was definitely  
19 treated different than my male counterparts in  
20 the unit.

21 Q. Well, so let me ask a more specific  
22 question because then maybe I can focus what I'm  
23 asking next.

24 You're saying that you felt treated  
25 differently as a female. And because, for

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example, it was all men in those meetings. What I'm asking you is, is there anything specifically, not including being a female, are there any instances where you felt Bernie treated you differently because you're a Latina? Excluding your gender. Leave that aside for the moment.

A. I just explained that to you.

You're treating me differently when you won't do this to a male commander. You're treating me differently when, as the female commander of the unit, you're excluding me from meetings that I should be attending to make decisions.

Q. Do you know how long Officer Eddis was the commanding officer for PAI?

A No

Q. And do you know who's the commanding officer before Eddis?

A No I don't recall

Q. So how do you know that Commanding Officer Eddis wasn't excluded from any of the meetings?

A. I don't know if he was excluded from any of the meetings, but according to Ted, he

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attended the monthly meetings with Eddis when Eddis was there.

Q. So your understanding of his attendance is from Ted?

A. And Bernie Prazenica and Ron, when they told me that -- when I came to PAL, that I would attend the same meetings, and it's attended with Ted on a monthly basis to talk about the problems and where they would make the decisions for PAL. So I was told that I would be invited, just like Lieutenant Eddis would be invited -- was attending those meetings, but I wasn't.

Q. Just so I'm clear, you have no personal knowledge from Commanding Officer Eddis, what meetings he attended or did not; is that correct?

A. My knowledge came from Bernie Prazenica and Ron Rabena.

Q. Apart from being excluded from the meetings, and Bernie not shaking your hand, what other incidents can you identify where you felt you were treated differently because of being Latina or a female, by PAL?

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2 she was relaying from Bernie and Ron Rabena.

3 Q. Did Bernie ever tell you that they  
4 sent Maureen Rush to deliver that message to  
5 you?

6 A. No. She told me. She confirmed it.

7 Q. Did Ron or Ted ever tell you that  
8 they sent her to deliver the message?

9 A. No. But Ted was the one that  
10 delivered the message under false pretense that  
11 I was meeting with her for programs.

12 (Email is received and marked as  
13 Exhibit PAL-5 for identification, as  
14 of this date.)

15 Q. This, Ms. Cintron, if you -- this  
16 was produced separately, but I believe it's  
17 related to PAL-3, looks to be -- they have the  
18 same subject matter and time frame.

19 A. Yes.

20 Q. And in PAL-3, it says: Does the  
21 time on 10/24 work for you? This was a date  
22 proposed by Ms. Faust. And in PAL-5, Ted  
23 responds to you -- PAL-5 is the one I just gave  
24 you.

25 A. This one?